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Rules and Directives
Branch

October 30, 2000

David L. Meyer, Chief
Rules and Directives Branch
Office of Administration Mail Stop T-6D59
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Draft NUREG-1725: Human Interaction with Reused Soil: A Literature Search

Dear Mr. Meyer:

My attention was drawn to this paper because I work with a public-interest nonprofit, Organic Consumers Association, on the issue of food irradiation, and I am interested in the sources and effects of low-level radiation in the environment.

In another capacity, I recently worked as one of a team of four people through the two years of an Agency for Healthcare Research and Quality contract doing a meta-analysis of the literature on a surgical topic. We completed the contract a year ago, and the three resulting papers have been published in the leading peer-reviewed journal in the field, *The Journal of Trauma*. I did not do the literature searches myself, but I became quite familiar with the process of discovering relevant studies.

The NAL team has obviously done a difficult job well in a short time, given the constraints imposed by the NRC. Reading between the lines, however, I see several major faults with the report as presented to the NRC, most of which are mentioned by the NAL team.

First, the constraint of English-language literature. This is indefensible scientifically, and the more so because, as one external reviewer points out, the experiences at Chernobyl and Hiroshima and Nagasaki are directly relevant. Experts should be consulted and asked if any foreign-language literature is particularly relevant, as a check on whether a search of English titles alone is adequate.

Second, the report appears to misunderstand the expert reviewer's request for epidemiological studies regarding Hiroshima and Nagasaki. The report states that the contamination there was acute and therefore irrelevant. How do the authors know there are no relevant reports in the Japanese-language literature about the reuse of contaminated soils from these locations over the past 50 years? The NRC should specifically seek out academics in Japan who study soil contamination, and ask them for relevant Japanese-language studies.

Third, I am surprised to see that there is only one study with Russian authors, and a second study about Chernobyl in Spanish. I can't believe that is the sum total of the relevant literature. Again, the NRC should seek out Chernobyl literature through expert contacts, in addition to internet searches.

Fourth, I agree with the recommendation to "Expand search concepts to include named radionuclides and their behavior in soil. In this approach special attention should be given to reviewing soil remediation at contaminated sites. This approach would include independent searches for each radionuclide, its isotope names, and its decay products." This seems a valuable addition to the search strategy.

Building on the NAL search, the NRC should also make a good-faith attempt to find literature that derives from *known* nuclear accidents. The public deserves nothing less.

Yours truly,

Danila B. Oder
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